

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

**CITY OF JOHNSON CITY,
TENNESSEE, et al.,**

Defendants.

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MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiffs move to file Exhibits 2-3 to the Declaration of Vanessa Baehr-Jones under seal. Sealed filing is appropriate here because Exhibits 2-3 are transcripts of the depositions of B.P. and H.A. which contain sensitive and private information about the details of their sexual assaults, the identifying information of their family members and minor children, as well as other sensitive and personal information that is appropriate to seal in order to maintain the victims' dignity and privacy. Additionally, sealing of the unredacted version of Plaintiffs' Motion for Protective Order is proper as the filing contains sensitive information from Exhibits 2 and 3.

Dated: July 2, 2024

Respectfully submitted,

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

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Attorneys for Plaintiffs and Proposed Class

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on July 2, 2024 to counsel of record:

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